

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

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) Criminal No. 17-201 (ABJ)
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FILED UNDER SEAL

**DEFENDANT PAUL J. MANAFORT JR.'S
MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL**

Pursuant to LCrR 49(f)(6), Defendant Paul J. Manafort, Jr., by and through counsel, hereby requests leave of the Court to file an unredacted version of Mr. Manafort's response to the Office of Special Counsel's submission in support of its breach determination (Attachment A) under seal. Mr. Manafort further seeks to file a redacted version of the response (Attachment B) into the public docket with the Court's approval.

Out of an abundance of caution, Mr. Manafort has attempted to conform his redactions to the Office of Special Counsel's prior redactions in its breach submission. (*See* Doc. 460 (Redacted Submission in Support of Breach Determination)). While Mr. Manafort is uncertain whether the redactions are necessary, he is proceeding in this manner in an effort to be consistent with the approach taken by the Office of Special Counsel and with the Court's prior order sealing the unredacted version of the Office of Special Counsel's submission.

WHEREFORE, Mr. Manafort requests that his unredacted response (Attachment A) be filed under seal and that a redacted version (Attachment B) be filed on the public docket after the Court rules on this motion. A proposed order accompanies this motion (Attachment C).

Dated: January 7, 2019

Respectfully submitted,

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